

940772

January 5th, 2018

Ms. Jamie Wallerstedt Minnesota Pollution Control Agency Remediation Division 520 Lafayette Avenue North St. Paul, Minnesota 55155

Subject: Trend Analysis of Wells Currently Exceeding AECOM Identified Trigger Values; MacGillis & Gibbs Superfund Site; AECOM Project 60549156; MPCA Work Order 3000019190

Ms. Wallerstedt,

AECOM Technical Services, Inc. (AECOM) has performed a trend analysis on a subset of wells included in the most recent sampling plan (Draft 2017) currently exceeding the AECOM defined trigger values identified in the MacGillis and Gibbs Extraction Well Contingency Plan (AECOM Contingency Memo 4-3-2017). AECOM utilized the Akrita-Thel-Sen (ATS) statistical method to analyze the PCP concentrations at these wells (MW-20, MW-19B, MW-23B and MW-105). Two separate trend analysis were performed for each well; one including PCP analytical data back to the year 2001 and the second includes all analytical data following the December 2014 extraction well shutdown of EW-1, EW-3B, EW-5, EW-12, EW-15, EW-16 and EW-18. These are included in **Table 1**.

Results

Based on the ATS trend analyses performed at the aforementioned wells in question; AECOM has identified two sampling locations where the trends indicate an increase in PCP concentrations (MW-20 and MW-23B). The rest of the trends were stable or decreasing.

Please contact Drew Tarara or Tony Coryell at 612-376-2000 with questions or comments in regards to this report or other project business.

Respectfully,

Andrew J. Tarara

And Towar

Project Manager

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Table 1: MacGillis & Gibbs Pentachlorophenol Trend Analysis Results

| Well ID | Parameter | n | ND | %ND | Slope | Intercept | Tau | p-value | | Increasing or Decreasing? |
|---------|-------------------|----|----|-----|-----------|-----------|-----------|----------|----------------------|------------------------------|
| MW-19B | Pentachlorophenol | 17 | 0 | 0% | -1.98E-01 | 8.19E+03 | -6.69E-01 | 2.02E-04 | Significant | Decreasing |
| MW-19B | Pentachlorophenol | 9 | 0 | 0% | 1.93E-01 | -8.08E+03 | 2.22E-01 | 4.66E-01 | No Significant Trend | No Significant Trend |
| MW-20 | Pentachlorophenol | 15 | 5 | 33% | 2.52E-03 | -9.68E+01 | 5.52E-01 | 3.61E-03 | Significant | Increasing |
| MW-20 | Pentachlorophenol | 9 | 0 | 0% | -3.64E-01 | 1.57E+04 | -3.89E-01 | 1.75E-01 | No Significant Trend | No Significant Trend |
| MW-23B | Pentachlorophenol | 13 | 0 | 0% | -5.07E-03 | 2.27E+02 | -1.41E-01 | 5.41E-01 | No Significant Trend | No Significant Trend |
| MW-23B | Pentachlorophenol | 8 | 2 | 25% | 5.10E-01 | -2.17E+04 | 8.93E-01 | 2.77E-03 | Significant | Increasing |
| MW-105 | Pentachlorophenol | 16 | 0 | 0% | -1.24E-01 | 5.08E+03 | -7.67E-01 | 3.89E-05 | Significant | Decreasing |
| MW-105 | Pentachlorophenol | 9 | 0 | 0% | -6.21E-03 | 3.47E+02 | -5.56E-02 | 9.17E-01 | No Significant Trend | No Significant Trend |

Notes:

Trend Analysis Only Includes Sample Collected Post 2014 Extraction Well Shutdown

if p-value < 0.05, significant and slope is negative; then significantly deceasing trend if p-value < 0.05, significant and slope is positive; then significantly increasing trend if ≥75% nondetect, no trend analyzed

Cibulskis, Karen

From: Wallerstedt, Jamie (MPCA) < jamie.wallerstedt@state.mn.us>

Sent: Friday, January 19, 2018 11:28 AM

To: Cibulskis, Karen

Subject: FW: Trend Analysis-M&G PCP Sampling Results

Attachments: Trend Analysis Memo.pdf

Hi Karen – Please find attached the trend analysis completed by AECOM for the MacGillis and Gibbs wells post shutdown.

We are authorizing AECOM to turn the wells back on.

Thanks (and hope you are doing well)! Jamie

From: Tarara, Andrew [mailto:Andrew.Tarara@aecom.com]

Sent: Friday, January 05, 2018 3:58 PM

To: Wallerstedt, Jamie (MPCA) <jamie.wallerstedt@state.mn.us>

Cc: Paulos, Petros < Petros. Paulos@aecom.com>; Coryell, Tony < tony.coryell@aecom.com>; Beck, Daryl

<darvl.beck@aecom.com>

Subject: Trend Analysis-M&G PCP Sampling Results

Hi Jamie-Attached is the short letter describing the results of the recent trend analysis that we completed following the most recent sampling event at M&G. This was completed in accordance with the revised/approved Contingency Plan (October 2017). If you require any of the raw data, please let me know and we can send you the excel version of the table or have our modeler get that to you.

We will await your final recommendation as it relates to potentially turning any of the extraction wells back on. We understand you will reach out/notify the EPA about this data. We have evaluated EW-3B and EW-5 for re-start and both can go online upon request.

Thanks, and have a great weekend.

Drew

Andrew J. Tarara

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